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HAND DELIVERED

January 22, 2024

Honorable Leonard P. Stark
United States District Court
844 North King Street (4th floor)
Wilmington, Delaware 19801

Re: *Ricardo Devengoechea v. Bolivarian Republic of Venezuela*, Misc. 23-609
Crystallex International Corp. v. Bolivarian Republic of Venezuela, Misc. 17-151

Dear Judge Stark:

My office represents Plaintiff-Judgment-Creditor Ricardo Devengoechea in Misc. 23-609 seeking to participate in the Citgo Oil sale process in the *Crystallex* case, Misc. 17-151.

I submit this cover letter to request timely filing on January 18, 2024 of Plaintiff Devengoechea's attached Reply in support of his motions for a Writ of Attachment and for leave to file his Statement of Judgment. As indicated in my January 18, 2024 email to Your Honor, my office timely submitted Plaintiff Devengoechea's attached Reply by hand-delivery that same day pursuant to this Court's Local Rule 83.5(e)(1) which temporarily permits my filings while we retain Local Counsel. Unfortunately, a deputy clerk at that time mistakenly rejected my filing, apparently unaware of that Local Rule. The docket sheets in both Misc. 17-151 and 23-609 show my prior filings which were properly accepted.

Later that same day January 18, 2024, I submitted my email to Your Honor, with a copy of Plaintiff Devengoechea's Reply, to show its timely submission.

I tried to rectify this matter promptly the next morning Friday January 19, 2024. However, the Clerk's office was closed that day because of the weather.

Plaintiff Devengoechea respectfully requests that his attached Reply be treated as timely filed on January 18, 2024.

Respectfully,

Dennis Grossman

Dennis Grossman
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(Authorized by D.Del.L.R. 83.5(e)(1)
for 30 days; Local Counsel to be Retained)

cc: Counsel of Record (by ECF)